

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HONEYWELL INTERNATIONAL INC. and
HONEYWELL INTELLECTUAL PROPERTIES
INC.,

C.A. No. 04-1338 (KAJ)

Plaintiffs,

v.

APPLE COMPUTER, INC., et al.,

Defendants.

**AFFIDAVIT OF PETER N. SURDO IN SUPPORT OF
HONEYWELL'S OPPOSITION TO DEFENDANT INNOLUX DISPLAY
CORPORATION'S MOTION TO DISMISS FOR
LACK OF PERSONAL JURISDICTION**

STATE OF MINNESOTA)
)ss
COUNTY OF HENNEPIN)

I, Peter N. Surdo, do hereby declare and state as follows:

1. I am one of the attorneys representing the Plaintiffs in this matter. I am submitting this Affidavit in Support of Honeywell's Opposition to Defendant Innolux Display Corporation's Motion to Dismiss for Lack of Personal Jurisdiction. I believe the documents attached to this Affidavit are true and correct copies of what they purport to be.

2. Attached as Exhibit A is a true and correct copy of a receipt from Amazon.com, an online retailer, listing products purchased by Honeywell, including one Audiovox D2010 DVD Player which was "torn down" by Honeywell employees and found to contain an LCD module manufactured by Innolux Display.

3. Attached as Exhibit B is a true and correct copy of a printout from Circuit City's website, <http://www.circuitcity.com>, that shows the availability of the Audiovox DT102DOPKG DVD player in the Wilmington, Delaware Circuit City store.

4. Attached as Exhibit C is a true and correct copy of a printout from Hoovers regarding Hon Hai Precision Industry Co., Ltd., available at http://www.hoovers.com/hon-hai/--ID__58638--/free-co-factsheet.xhtml?cm_ven=PAID&cm_cat=INK&cm_pla=CO1&cm_ite=hon-hai.

5. Attached as Exhibit D is a true and correct copy of a printout from the Delaware Secretary of State website, available at <https://sos-res.state.de.us/tin/controller>.

6. Attached as Exhibit E is a true and correct copy of a printout from the EMS News Archives of a report titled, "Hon Hai to increase investment in Innolux," dated July 13, 2004, available at <http://www.emsnow.com/newsarchives/archivedetails.cfm?ID=5574>.

7. Attached as Exhibit F is a true and correct copy of a printout from the Canadian government's Strategis website, entitled "Rising Capital Spending for Advanced TFT-LCD Panel Production in Taiwan," dated March 7, 2003, available at <http://strategis.ic.gc.ca/epic/internet/inimr-ri.nsf/en/gr114707e.html>.

8. Attached as Exhibit G is a true and correct copy of a printout from the EMS News Archives of a report titled, "Hon Hai to challenge NT\$2 Trillion for turnover," dated January 27, 2006, available at <http://www.emsnow.com/newsarchives/archivedetails.cfm?ID=11678>.

9. Attached as Exhibit H is a true and correct copy of a printout from the Taipei Times of a report titled, "Innolux expects to turn profitable," dated October 7, 2005, available at <http://www.taipeitimes.com/News/biz/archives/2005/10/07/2003274815>.

10. Attached as Exhibit I is a true and correct copy of a printout from the Taipei Times of a report titled, "Innolux Display plans 2006 IPO," dated September 22, 2004, available at <http://www.taipeitimes.com/News/biz/archives/2004/09/22/2003203902>.

11. Attached as Exhibit J is a true and correct copy of a printout from the Financial Times Global 500 for 2006, available at http://media.ft.com/cms/adb61f66-f7bf-11da-9481-0000779e2340,dwp_uuid=c9034b2c-f175-11da-940b-0000779e2340.pdf.

12. Attached as Exhibit K is a true and correct copy of a printout from the Electronic Business Magazine titled, "Why is Hon Hai So Shy? One stealthy Taiwanese company is quietly sprinting to the top of the EMS sector," by Dennis Normile, dated April 2004, available at <http://www.edn.com/index.asp?layout=article&articleid=CA405740&partner=eb&industryid=21>.

13. Attached as Exhibit L is a true and correct copy of a printout from Business Week Online's 2005 Information Technology 100 report, available at <http://www.businessweek.com/it100/2005/company/HONHI.htm>.

14. Attached as Exhibit M is a true and correct copy of a Datamonitor Company Profile for Hon Hai Precision Industry Company Limited.

15. Attached as Exhibit N is a true and correct copy of a MasterLink Securities Equity Research Report on Hon Hai Precision, available at http://web6.masterlink.com.tw/project/english/main_page/files/company_reports/2317%20TT%2020050624.pdf#search=%22hon%20hai%20lcd%22.

16. Attached as Exhibit O is a true and correct copy of a printout from The Inquirer of a report titled, "Hon Hai's profits almost double on Ipod boost," dated September 1, 2006, available at <http://www.theinquirer.net/default.aspx?article=34089>.

17. Attached as Exhibit P is a true and correct printout from the Foxconn website home page, available at www.foxconn.com.

18. Attached as Exhibit Q is a true and correct printout from the Foxconn website global network page, available at <http://www.foxconn.com/about/global.asp>.

19. Attached as Exhibit R is a true and correct printout from the Foxconn website contact us network page, available at <http://www.foxconn.com/other/contactus.asp>.

20. Attached as Exhibit S is are true and correct printouts from the Foxconn website iPaq store page, available at <http://www.services.foxconn.com/>.

21. Attached as Exhibit T is a true and correct printout of an e-mail from the Foxconn iPAQ store e-mail address.

22. Attached as Exhibit U is a true and correct copy of a printout from the EMS News Archives of a report titled, "Hon Hai breaks ground on new plant," dated May 22, 2003, available at <http://www.emsnow.com/newsarchives/archivedetails.cfm?ID=1652>.


23. Attached as Exhibit V is a true and correct copy of printouts from the Texas Comptroller of Public Accounts, available at <http://ecpa.cpa.state.tx.us/coa/Index.html>.

24. Attached as Exhibit W is a true and correct copy of printouts from Circuit City's website, produced by checking the availability of the following products in the Wilmington, Delaware store: (1) the HP LCD monitor, Model No. VS15; (2) the Acer LCD monitor, Model No. AL1716BS; and (3) the LG 23" LCD HDTV monitor, Model No. 23LX1RV.

25. Attached as Exhibit X is a true and correct copy of a printout from Circuit City's website, produced by checking the availability of ViewSonic LCD monitors for purchase through the Circuit City website.

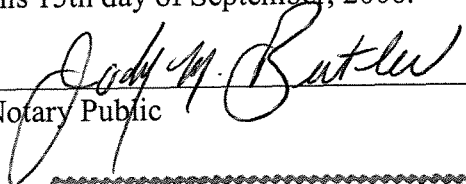
26. Attached as Exhibit Y is a true and correct copy of printouts from Dell's website, available at www.dell.com, produced by selecting the UltraSharp 1907FP LCD monitor and selecting shipment to a zip code for Wilmington, Delaware.

YOUR AFFIANT SAYETH NOT.

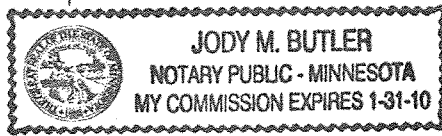


Peter N. Surdo

Subscribed and sworn to before me
this 15th day of September, 2006.



Notary Public



CERTIFICATE OF SERVICE

I certify that on September 18, 2006, I caused to be served true and correct copies of the foregoing on the following by hand and by e-mail:

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